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January 25, 2021

## **BY ECF**

Hon. Andrew L. Carter, Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, N.Y. 10007

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Re: <u>U.S. v. Eldi Makishti</u>, Cr. No. 20-660

## Your Honor:

I am the court-appointed attorney for Mr. Eldi Makishti. The purpose of this letter is to move this Honorable Court to modify the conditions of bail release so that Mr. Makishti can travel to New Jersey for work purposes.

On December 10, 2020, Mr. Makishti's bail hearing was held before the Hon. Sarah Netburn, United States Magistrate Judge, who, on consent of the parties, imposed conditions of bail release, including travel restricted to the Southern and Eastern Districts of New York. Mr. Makishti is currently employed by AM Glass Architecture, where his job consists of installing glass, curtains, railings, and windows in apartments throughout Manhattan, Brooklyn and Queens. His employer has asked him to work in apartments in New Jersey as well.

I spoke to Mr. Makishti's supervising pre-trial officer, Dominique Jackson, who does not object to the modification of bail conditions to include the District of New Jersey for work purposes, so long as Mr. Makishti advises her every time he is scheduled to work in that District. AUSA David Russell Felton told me the government on this matter deferred to the U.S. Pre-Trial Services Office and that they do not object to this proposed modification.

For these reasons, Mr. Eldi Makishti, through counsel, respectfully requests that the bail conditions be modified so that he can work in the District of New Jersey when his supervisor calls him to do so, with the requirement that in these situations he inform his pre-trial supervising officer.

Respectfully,

S/Leonardo M. Aldridge

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The application is GRANTED. So Ordered

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